



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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*271 Cadman Plaza East  
Brooklyn, New York 11201*

April 17, 2023

By ECF

Honorable Peggy Kuo  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Scott, et al. v. United States*, 19-cv-1075 (ERK) (PK)

Dear Judge Kuo:

This Office represents defendant United States of America in the above-referenced matter. Defendant writes on behalf of all parties, and pursuant to the Court's Order of March 21, 2023 to provide a joint status report informing the Court of the progress since the parties last updated the Court on March 21, 2023, *see* Dkt. No. 205, and to request a stay of discovery until May 17, 2023, to allow the parties to engage in further negotiations.

Following three mediation sessions before former Magistrate Judge Steven Gold over the past few months, the parties continue to make substantial progress toward reaching a potential settlement agreement. Since our last update on March 21, 2023, the parties have conferred further regarding the proposed settlement; to wit, the parties participated in a lengthy telephone conference and Defendant recently shared a revised draft of a proposal addressing a number of the issues raised during the conference. A further extension of all discovery deadlines will allow the parties to further negotiate all outstanding terms, in the hopes of reaching a final resolution in the near future.

Accordingly, the parties respectfully request that the Court stay discovery until May 17, 2023, to allow the parties to further negotiate the terms of their potential settlement agreement. We propose providing a joint status update to the Court on May 17, 2023.

We thank the Court for its consideration of this matter.

Respectfully submitted,

BREON PEACE  
United States Attorney

By: /s/ electronically signed  
Sean P. Greene-Delgado  
Shana C. Priore  
Paulina Stamatelos  
Philip R. DePaul  
Assistant U.S. Attorneys  
(718) 254-6484/6188/6198/7503  
sean.greene@usdoj.gov  
shana.c.priore@usdoj.gov  
pauline.stamatelos@usdoj.gov  
philip.depaul@usdoj.gov

cc: All counsel of record (by ECF)